

April 30, 2009

TO: Tana Gann, Field Representative
Kathy Andruss, Classification Specialist
Washington Federation of State Employees (WFSE)

FROM: Teresa Parsons, SPHR
Director's Review Program Supervisor

SUBJECT: Kathleen Troxell v. Department of Health (DOH)
Allocation Review Request ALLO-08-052

On April 8, 2009, I conducted a Director's review conference at the Department of Personnel, 2828 Capitol Boulevard, Olympia, Washington, concerning the allocation of the following Customer Service Specialist 2 (CSS 2) positions at DOH:

Rita Hawkins	Position #70094824
Aaron Kelley	Position #70094754
Michele Ledbetter	Position #70118130
Christina Nosich	Position #70094836
Sibylle Oatney	Position #70094973
April Finlay	Position #70118128
Kathleen Troxell	Position #70118129

The following individuals were present at the Director's review conference: Michele Ledbetter; Rita Hawkins; Tana Gann, Field Representative, WFSE; Kathy Andruss, Classification Specialist, WFSE; Rozanne Stewart, Human Resources Consultant, DOH; and Shannon Beigert, Customer Service Director for the Customer Service Office within the Division of Health Systems Quality Assurance (HSQA) at DOH.

Director's Determination

This position review was based on the work performed for the six-month period prior to May 13, 2008, the date Ms. Troxell submitted her Position Review Request to the Office of Human Resources (HR) at DOH. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Ms. Troxell's assigned duties and responsibilities, I conclude her position should be reallocated to the Forms and Records Analyst 2 classification.

Background

The above employees are assigned to the Public Disclosure Unit within the Customer Service Office of the Division of Health Systems Quality Assurance (HSQA) (Exhibit B-2). At the time of the request, the employees reported to Health Services Consultant 3 Valerie Zandell. The June 1, 2008 organizational chart shows Ms. Hawkins and Ms. Nosich under the Renewals/Revenue Unit; however, that assignment occurred after the time period relevant to this review (Exhibits B-6-a/b). At the time relevant to this review, the employees all worked in the Public Disclosure Unit shown on the organizational chart. The Public Disclosure Unit processes requests as a centralized function for the HSQA Division. A memo from HSQA Assistant Secretary Ron Weaver on December 30, 2002 indicates that he designated the unit as the Public Disclosure and Record Retention Customer Service Center within HSQA as a Customer Service Unit (Exhibit C-4).

In March 2008, the Position Description Form (PDF) for April Finlay's position had been updated as part of the annual performance evaluation process. Ms. Finlay and the unit supervisor, Ms. Zandell, signed her PDF on February 29, 2008. Customer Service Director Shannon Beigert, signed the PDF as the Department Head on March 10, 2008 (Exhibit B-5-l). Ms. Zandell also completed a job analysis, dated February 29, 2008 (Exhibit B-5-m). After updating Ms. Finlay's PDF, Ms. Zandell updated the PDFs for the other positions in the Public Disclosure Unit as well. Ms. Beigert, however, did not sign the other PDFs, which were submitted to the HR Office with the employees' and supervisor's signatures but not the Department Head's signature. The employees stated that the updated PDFs, signed April 8, 2008, were intended to be submitted as reallocation requests. Ms. Beigert stated that she was unaware that PDFs for the other employees had been submitted to the HR Office until after the fact. The HR Office received Ms. Troxell's PDF on April 9, 2008, but treated it as an update, not a reallocation request (Exhibit B-5-g).

As part of an ongoing reorganization, new PDFs were reviewed and updated for all positions in the Customer Service Office, including the Public Disclosure Unit. Ms. Stewart stated that the reorganization occurred around June or July 2008. Ms. Zandell and the Chief Administrator for HSQA, Shannon (Sam) Marshall, signed an updated PDF for Ms. Troxell's position on April 23 and 25, 2008, respectively. The HR Office received the new PDF on May 1, 2008 (Exhibit B-5-h). On May 13, 2008, Ms. Troxell submitted a Position Review Request (PRR) to the HR Office, requesting reallocation from the CSS 2 classification to the Forms and Records Analyst 2 (F&RA 2) classification. On May 21, 2008, Ms. Stewart returned the PRR to Ms. Zandell to complete the Supervisor Review Section (Exhibit C-5). The HR Office received the PRR with the completed Supervisor Review Section on June 10, 2008 (Exhibit A-10). By letter dated, August 5, 2008, Ms. Stewart informed Ms. Troxell her position was properly allocated to the CSS 2 classification. Specifically, Ms. Stewart concluded that Ms. Troxell performs journey level customer service for public disclosure requests and that her position is assigned to a designated Customer Service Unit (Exhibit A-3).

On August 22, 2008, we received Ms. Troxell's request for a Director's review of DOH's allocation determination, filed by Tana Gann, WFSE.

Summary of Employees' Perspective (Hawkins, Kelley, Ledbetter, Nosich, Oatney, Finlay and Troxell)

The employees believe their positions are misallocated because the primary functions of their positions deal with public disclosure related activities. The employees further believe their positions have been misallocated since DOH centralized the public disclosure function in 2003. The employees recognize there is a customer service component to responding to public disclosure requests but assert it is no different from other employees providing service to the public. The employees contend that all state employees in fact provide service to the public. The employees assert their positions are distinguished from CSS 2 positions by the high degree of specialized knowledge with regard to public disclosure laws, level of independence, and program coordination responsibilities for handling all public disclosure requests within HSQA. The employees contend the duties they perform are specifically encompassed in the F&RA 2 classification, which they believe is the appropriate fit for their positions.

Summary of DOH's Reasoning

DOH acknowledges the bulk of work assigned to the employees' positions deals with public disclosure. However, DOH asserts the employees are providing customer service to internal and external customers making public disclosure requests. DOH further asserts the employees in the Public Disclosure Unit respond to telephone inquiries about public disclosure that do not always result in an actual request. DOH contends that both the CSS 2 and the F&RA 2 classifications include work involving customer service but maintains that the employees in this case respond to customer service inquiries as they relate to public disclosure. DOH further contends that the employees are specifically assigned to a designated Customer Service Unit. DOH asserts the employees work within pre-established guidelines and that a staff attorney provides advice on issues outside of standard requests. DOH further asserts the employees do not provide consultation to management. DOH contends customer service is the primary focus of these positions and believes the CSS 2 classification is the appropriate fit.

Rationale for Director's Determination

During the Director's review conference, Ms. Beigert gave an overview of services provided by the HSQA Division. Ms. Beigert indicated that the HSQA Division regulates health providers ranging from medical practitioners, hospitals and health care facilities to acupuncturists to veterinarians. HSQA also incorporates emergency service workers and vehicles, as well as transient and migrant worker accommodations. The Customer Service Office has responsibility for all activities related to operations. This may include complaints about providers to questions about licensing and credentialing of medical providers and facilities. The organizational chart illustrates the different units within the Customer Service Office handling a variety of functions including centralized intake, complaints, inquiries, credentials, investigations, and an adjudicative unit dealing with disciplinary actions. The employees in this case are assigned to the Public Disclosure and Record Retention Unit within the HSQA Customer Service Office.

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the

volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Both the Personnel Appeals Board and the Personnel Resources Board have held that because a current and accurate description of a position's duties and responsibilities is documented in an approved classification questionnaire, the classification questionnaire becomes the basis for allocation of a position. An allocation determination must be based on the overall duties and responsibilities as documented in the classification questionnaire. Lawrence v. Dept of Social and Health Services, PAB No. ALLO-99-0027 (2000). The Position Description Form (PDF) replaced the classification questionnaire.

It is undisputed the employees in this case are assigned the same duties and level of responsibility within the Public Disclosure Unit in HSQA and report to the same supervisor, Ms. Zandell. It is also undisputed that the employees perform work relating to public disclosure for the division the majority of the time. When Ms. Zandell updated April Finlay's PDF, Ms. Beigert signed the PDF on March 10, 2008, indicating the job duties accurately reflected the work performed by the position (Exhibit B-5-l). In addition, the job analysis completed by Ms. Zandell on February 29, 2008, supported the assignment of work to Ms. Finlay's position (Exhibit B-5-m). Although a Department Head or Approving Authority did not sign the April 2008, updated PDFs for the other employees in the unit, the PDFs described work identical to Ms. Finlay's PDF. Ms. Zandell and the other employees in the unit, including Ms. Troxell, signed the PDFs on April 8, 2008. The HR Office received the updated PDFs on April 9, 2008 (Exhibits B-5-a/c/e/g/i/j).

The Position Objective on the April 8, 2008 PDFs states:

This position supports the Department's mission to protect and improve the health of the state of Washington by providing professional and technical expertise by delivering quality public disclosure services to HPQA programs. Public disclosure requests are from the general public, government offices, attorneys, medical facilities, businesses, and other entities.

The responsibilities include the following:

- Responding to public disclosure requests within the required five (5) days of receipt.
- Applying strict rules (RCW 42.56) and guidelines (DOH policy 17.003; HPQA Procedure 422) for redacting . . .
- Processing public disclosure requests, locating and retrieving records.
- Redacting legal documents for position on the DOH website Provider Credential Search: Posting Summary actions within 24 hours of service and routine actions within 72 hours of service.
- Responding to requests for "lists and labels" . . .
- Updating and maintaining the tracking systems related to public disclosure requests and redaction process.

- Managing records of health professions and facilities that are regulated by the Department of Health, including archiving, tracking, locating and retrieving files.
- Assisting management with retention and storage of manual, electronic and/or automated records.
- Treating Media requests as priority . . .

The majority of work, identified as 60%, includes answering public disclosure requests ranging from simple requests involving a small number of documents to complex inquiries involving a high volume of documents or varying legal principles. This section also notes the positions consult with management concerning records retention and retrieval, analyze records management problems, and assist management in planning and implementing standard and specialized filing systems.

After the HR Office received the updated PDFs on April 9, 2008, Ms. Stewart sent an email to Ms. Zandell, which stated, in part:

. . . In reviewing several PDF updates that you recently submitted for your staff, it appears that Customer Service Specialist 2 is no longer the most appropriate allocation level for the positions. . . .

The Forms and Records Analyst 2 classification appears to now be the most appropriate allocation level for these positions. . . . (Exhibit B-4-b).

Ms. Zandell subsequently met with Ms. Beigert and Workforce Manager Kathryn LePome to discuss the updated PDFs. On April 11, 2008, Ms. Zandell sent an email indicating, in part:

. . . Some changes will be made to the position descriptions to more completely and accurately reflect the position objectives and responsibilities assigned:

The position objective is more about applying knowledge of the public disclosure regulations and responding to internal and external questions regarding public disclosure. It is less about providing professional and technical forms and records expertise, analyzing records management systems or creating forms. The Public Disclosure Unit is part of a designated Customer Service Unit. . . . (Exhibit B-4-c).

Ms. Zandell then created new updated PDFs for the employees, which she and Chief Administrator for HSQA, Shannon (Sam) Marshall, signed on April 23 and 25, 2008. The HR Office received these PDFs on May 1, 2008 (Exhibits B-5-b/d/f/h/k/n and D-1).

The Position Objective on the April 23-25, 2008 PDF for Ms. Troxell position (#70118129) reads (Exhibit B-5-h):

This position supports the Department's mission to protect and improve the health of the state of Washington by applying knowledge of public disclosure regulations and processes in the delivery of quality public disclosure services to internal and external customers. Responds to public disclosure requests and

inquiries received from the general public, government offices, attorneys, medical facilities, businesses, and other entities.

The position objective above describes a scope of work similar to that of the earlier PDF. However, the latter PDF, like Ms. Zandell's email, emphasizes delivery of quality services by applying knowledge of public disclosure regulations rather than providing professional and technical expertise. The body of work identified on the latter PDF (April 23-25, 2008) does not change substantially. Rather, there were some changes as to the characterization of the work. In the section below, I included and highlighted (bolded) changes from the earlier PDF.

Within a designated Customer Serve Unit in Health Systems Quality Assurance, the responsibilities include the following:

- Responding to ***internal and external customer questions about public disclosure regulations, rules, and processes.***
- Responding to public disclosure requests within set timelines.
- Processing public disclosure requests, locating and retrieving records, redacting records, and providing response letters.
- Redacting documents ***based on clearly identified and defined criteria.*** This requires the application of rules (RCW 42.56) and department policies, procedures, and guidelines.
- Responding to requests for "lists and labels" . . .
- Updating and maintain the tracking systems related to public disclosure requests and redaction process.
- Retaining, archiving, retrieving, and tracking files and records regulated by the Department of Health. ***The previous description to manage and assist management with retention and storage of manual, electronic and/or automated records was not included on the April 23-25, 2008 PDF.***
- Providing back-up support to other unit positions assigned to respond to requests for "lists and labels" within set time limits, providing information and/or instructions of procedural steps that can be used to obtain requested information.

While the employees in the Public Disclosure Unit respond to requests and redact sensitive information based on criteria, they are still required to apply knowledge of public disclosure regulations and processes. Further, the work activities described as 60% indicate the positions respond to and track public disclosure requests from initial receipt through resolution. The specific duties in response to public disclosure requests include:

- Communicating effectively and in a timely manner, both in person and in writing with internal and external customers.
- Providing information on public disclose rules, procedures, and processes.
- Acknowledging requests within 5 days, which come in by e-mail, written correspondence, telephone, and fax.
- Prioritizing work and adjusting to respond to urgent matters.

- Researching the HSQA data systems for reference to docket numbers and case numbers on disciplinary actions taken against credentialed professionals.
- Accessing and updating data in agency systems, including tracking related to daily work activities and public disclosure request and redaction processes, maintaining accurate records of requests and responses.
- Reviewing and redacting legal documents for public disclosure, following established guidelines set by rule and policy (RCW 42.56, DOH Policy), using appropriate procedures and pre-established response form letters when responding to records requests.

During the Director's review conference, Ms. Ledbetter and Ms. Hawkins acknowledged they will answer telephone inquiries or assist walk-in customers but stated the majority of requests come in through mail, email, or fax. When there is not a written record for a request, the employees create a written document to begin a paper trail for the request. The employees track all requests on an Excel records log and maintain a locked file room containing the redacted copies of public disclosure requests for two years. Depending on the request, the employees may locate a redacted version of the record in their file room, request the record from the state records center (archives), or contact the appropriate program area within HSQA to locate the information requested. The employees also reference the HSQA data systems to locate docket numbers and case numbers on disciplinary actions against health care professionals.

The work activities described as 20% on the April 23-25 PDF and 28% on the PRR involve the reviewing and redacting of legal documents using LaserFische for posting on the DOH website's Provider Credential Search. The employees review each other's redactions for errors prior to posting on the web. The employees in the Public Disclosure Unit maintain the electronic copies of the legal documents, while the hard copies remain in the Adjudicative Clerks Unit.

After the HR Office received the employees' updated PDFs on May 1, 2008, Ms. Stewart sent an email to Ms. Marshall on May 2, 2008, stating:

... it appears that Forms & Records Analyst 1 is the 'best fit' allocation level for these positions" (Exhibit B-4-e).

During the Director's review conference, Ms. Stewart explained that her email responses regarding the allocation of these positions were informal based on a cursory review of the PDFs. Ms. Stewart further indicated the PDFs were considered updates, not reallocation requests. Ms. Beigart also noted that all PDFs were being updated as part of a reorganization and that management had been meeting to discuss the duties assigned to all positions in the Customer Service Office.

On May 13, 2008, Ms. Troxell submitted a Position Review Request (PRR) to the HR Office. Ms. Stewart returned the PRR to Ms. Zandell to include a Supervisor Response Section. The PRR was resubmitted on June 10, 2008 (Exhibit A-8). The Position Purpose described on the PRR is identical to the Position Objective on the April 23-25 PDF signed by Ms. Zandell and Ms. Marshall (Exhibit B-5-h). However, Ms. Troxell emphasizes that her position requires a high degree of specialized knowledge, responsibility, and independence, and that her work

includes program coordination duties, which is more in line with the April 8, 2008 PDF (Exhibit B-5-g). In either case, the main job duties listed on the PRR are fairly consistent with those identified as 60% on the PDFs. Included in her list of duties, Ms. Troxell adds that she provides a detailed exemption spreadsheet with the completion of each request and that she maintains records of requests and responses in the agency shared public disclosure log.

In the Supervisor Review Section of the PRR, Ms. Zandell indicates that the information on the PRR is not accurate and complete. However, much of the information included on the PRR is consistent with the duties described on the PDF, which Ms. Zandell and Ms. Marshall signed on April 23 and 25, 2008. The main discrepancy highlights the application of knowledge of public disclosure regulations, rules, and processes rather than specialized knowledge. Ms. Zandell also points out the position responds to public disclosure within a designated Customer Service Unit. Ms. Zandell indicates the employees of the Public Disclosure Unit follow established guidelines and pre-established responses. Ms. Zandell notes the work is routine and involves several related and repetitive tasks requiring some judgment but that complex issues require guidance from her or the assigned staff attorney. Ms. Zandell indicates the level of supervision required is on a spot-check basis only. She also references some changes in the percentages of work activities; however, the majority of work still revolves around handling public disclosure requests.

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations. While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification.

The Class Series Concept for Customer Service Specialist positions indicates:

Positions in this series provide assistance and problem resolution to agency clients/customers and are located in a designated customer service program. The intent of the series is to assist clients/customers in identifying agency processes and procedures, resolving client/customer problems related to agency programs and interpreting agency related laws, policies and procedures. Positions at all levels may be assigned lead or supervisory responsibility over lower level staff.

The **definition** for the **Customer Service Specialist 2** reads:

Independently resolves complaints, inquiries and client/customer service problems while maintaining appropriate confidentiality. Provides agency interpretation and applies knowledge of laws, regulations, and processes in the resolution of inquiries, complaints and problems.

Examples of typical work at the CSS 2 level include:

- Acting as liaison between clients/customers and agency; giving presentations and offers assistance to other State and Federal agencies;

- Independently resolving client/customer problems by identifying the issues, determining procedural steps necessary to bring resolution, working with program staff to implement resolution, and communicating results to the client/customer;
- Creating and managing customer profiles and maintaining integrity of the data and information while delivering specialized services.

The organizational structure of the HSQA Division puts operational functions ranging from complaint intake and call center duties to requests for public disclosure in the Customer Service Office. During the Director's review conference, the parties confirmed that when there is an inquiry involving public disclosure the request is sent to the Public Disclosure Unit for the employees in this case to handle. While I realize DOH views the Public Disclosure Unit as a work unit providing customer service, the primary focus of the positions is to respond to and process public disclosure requests from start to finish. In a broad context, the services these employees provide may fit into the Customer Service Specialist classes. However, in a similar scenario, the PRB concluded that while one class appeared to cover the scope of a position, there was another classification that not only encompasses the scope of the position, but specifically encompassed the unique functions performed. Alvarez v. Olympic College, PRB No. R-ALLO-08-013 (2008). Further, the Board has consistently held that "[w]hen there is a definition that specifically includes a particular assignment and there is a general classification that has a definition which could also apply to the position, the position will be allocated to the class with the definition that includes the position" Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989).

Although a specific class series concept is not identified for the Forms & Records Analyst classes, the definition for the first class in the series (F&RA 1) specifically states, in part, that positions provide assistance in all phases of manual, electronic and/or automated forms control, records management and/or public records disclosure.

At the **Forms and Records Analyst 2** level, the **definition** states, in part:

. . . provide consultation to managers and perform journey-level forms and/or records work such as analyzing manual, electronic and/or automated forms and/or records management problems . . . Incumbents assist with and coordinate records retention . . . utilize manual, electronic and/or automated systems, and provide consultation on forms and/or records management programs and system requirements. Incumbents conduct record inventories, assist with reviewing and updating record retention schedules and coordinate, retrieve information for and respond to public record requests.

Additionally, as identified on the F&RA 2 class specification, typical work includes reviewing and processing routine requests for public records/public disclosure and locating and retrieving the necessary records.

The employees perform journey level work responding to and processing all public disclosure requests for the HSQA Division. While they do assist internal/external customers with questions about public disclosure, they are also responsible for responding to the requests in accordance with public disclosure law, including required timeframes and redacted information

as necessary. The employees work with other programs in HSQA to retrieve the information necessary to fill a request. They also assist with records retention and manage and track the retention of public disclosure requests. In addition, the employees maintain an electronic format of legal documents relating to the credentials of a health care provider or facility. I understand the employees may consult with a staff attorney for public disclosure requests that address unique or new circumstances affecting health services. However, as illustrated by the typical work examples of an F&RA 2, assignments include processing routine requests for public records. At the F&RA 3 level, positions function as a management consultant for complex record problems and for determinations on responses to public record requests.

In Salsberry v. Washington State Parks and Recreation Commission, PRB Case No. R-ALLO-06-013 (2007), the Personnel Resources Board addressed the concept of best fit. The Board referenced Allegri v. Washington State University, PAB Case No. ALLO-96-0026 (1998), in which the Personnel Appeals Board noted that while the appellant's duties and responsibilities did not encompass the full breadth of the duties and responsibilities described by the classification to which his position was allocated, on a best fit basis, the classification best described the level, scope and diversity of the overall duties and responsibilities of his position.

Overall, the majority of work and scope of responsibility assigned to Ms. Troxell's position best fits the Forms and Records Analyst 2 classification.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

If no further action is taken, the Director's determination becomes final.

c: Kathleen Troxell
Rozanne Stewart, DOH

Enclosure: List of Exhibits

KATHLEEN TROXELL v DOH

ALLO-08-052

Exhibit List

A. Filed by employee August 22, 2008:

1. Letter of request from Tana Gann, WFSE, dated August 21, 2008.
2. Director's Review Request form.
3. Agency Allocation determination letter dated July 31, 2008: Correction letter DOH August 5, 2008 allocation determination.
4. Customer Service Specialist 2 Classification Specifications.
5. Forms and Records Analyst 2 Classification Specifications.
6. Customer Service Specialist 1 Classification Specifications.
7. December 30, 2002 memo to Rozanne Stewart, HR, from Ron Weaver.
8. July 17, 2008 memo to Valerie Zandell from Rozanne Stewart.
9. July 17, 2008 email from Rozanne Stewart to Kathleen Troxell.
10. Position Review Request/Supervisor Response, July 2008.
11. Forms and Records Analyst 2 DSHS recruitment March 2008.(outside scope)
12. Forms and Records Analyst 2 DOC recruitment February 2008 (outside scope)
13. Position Description signed April 2008.

B. Filed by Tana Gann (WFSE Representative) Employee Exhibits on September 19, 2008:

1. Memo from Governor Gregoire
2. Organizational Chart
3. PDF for Unit Supervisor (Valerie Zandell)
4. E-mail Communications
 - a. January 25, 2008 between Valerie Zandell and Rozanne Stewart
 - b. April 9, 2008 - Valerie Zandell and Rozanne Stewart
 - c. April 11, 2008 - Valerie Zandell and Rozanne Stewart
 - d. April 22, 2008 – Christina Nosich and Tana Gann, WFSE
 - e. May 2 and April 29, 2008 – Rozanne Stewart, Shannon Beigert, Shannon (Sam) Marshall
 - f. May 12, 2008 – Michele Ledbetter, Tana Gann
 - g. May 6, 2008 Michele Ledbetter, Rozanne Stewart, Tana Gann
5. The Units PDF's dated and signed 4/8/2008 and 4/23-25/2008
 - a. Sibylle Oatney – date stamped April 9, 2008
 - b. Sibylle Oatney – date stamped May 1, 2008
 - c. Michele Ledbetter – date stamped April 9, 2008
 - d. Michele Ledbetter – date stamped May 1 2008
 - e. Aaron Kelley - date stamped April 9, 2008
 - f. Aaron Kelley - date stamped May 1, 2008
 - g. Kathleen Troxell - date stamped April 9, 2008

- h. Kathleen Troxell - date stamped May 1, 2008
 - i. Christina Nosich - date stamped April 9, 2008
 - i. (Christina Nosich –date stamped May 1, 2008, is exhibit D-1)
 - j. Rita Hawkins - date stamped April 9, 2008
 - k. Rita Hawkins - date stamped May 1, 2008
 - l. April Finlay – date stamped March 12, 2008
 - m. April Finlay – Job Analysis Record date stamped March 12, 2008
 - n. April Finlay – date stamped May 1, 2008
 - 6. Position Action Request Forms
 - a. Christina Nosich – date stamped May 15, 2008
 - b. Rita Hawkins - date stamped May 15, 2008
 - 7. Classification Specifications
 - a. Forms and Records Analyst 2 (outside scope)
 - b. Forms and Records Analyst 3 (outside scope)
- C. Filed by DOH (Rozanne Stewart) August 14, 2008:**
- 1. Classification specs – Customers Service Specialist 2.
 - 2. Classification specs – Customers Service Specialist 1.
 - 3. Classification specs – Forms & Records Analyst 2.
 - 4. Memo – Dated December 30, 2002 from Ron Weaver re: Customer Service Unit
 - 5. Letter – Dated May 21, 2008 from Rozanne Stewart to Valerie Zandell re: Position Review Requests
 - 6. April Finley Position Review Request form dated and signed along with Supervisor Management Review and Response.
 - 7. Job Announcement for DOC – Forms & Records Analyst 2
 - 8. Job Announcement for DSHS – Forms & Records Analyst 2
- D. Email from Teresa Parsons to Tana Gann, Kathy Andruss, Rozanne Stewart requesting Christina Nosich PDF dated May 1, 2008**
- 1. Christina Nosich PDF dated May 1, 2008